

Douglas M. Rowan  
Nevada Bar No. 4736  
**WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**  
300 South Fourth Street, 11th Floor  
Las Vegas, Nevada 89101  
(702) 727-1400; FAX (702) 727-1401  
douglas.rowan@wilsonelser.com  
*Attorneys for defendant Target Corporation*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

REBECCA MARTIN, an Individual;

|CASE NO.: 2:17-cv-02329-APG-NJK

**Plaintiff,**

**STIPULATED REQUEST FOR  
EXTENSION OF DISCOVERY  
DEADLINES (Third Request)**

TARGET CORPORATION, a Foreign Corporation;  
YET UNKNOWN EMPLOYEE; DOES I through  
X, inclusive,

## Defendants.

The above named parties, by and through their respective counsel of record, hereby submit the following STIPULATED REQUEST FOR EXTENSION OF DISCOVERY DEADLINES (Third Request).

## A. DISCOVERY COMPLETED TO DATE

This matter involves a slip and fall at one of defendant's stores. On October 10, 2017, the parties held an initial Rule 26(f) Conference. Defendant served its initial disclosure of witnesses and documents on October 12, 2017. Plaintiff served her initial disclosure of witnesses and documents on October 10, 2017. On October 17, 2017, the Court entered a Stipulated Discovery Plan/Scheduling Order. On December 20, 2017, the Court entered an order granting the parties' first request to extend the discovery deadlines. On March 5, 2018, the Court entered an order granting the parties' second request to extend the discovery deadlines.

On October 17, 2017, defendant propounded a First Set of Interrogatories and First Set of Requests for Production of Documents upon plaintiff. Plaintiff served her responses to the Interrogatories on November 20, 2017 and responses to the Requests for Production of Documents on November 28, 2017. On October 30, 2017, plaintiff propounded a First Set of Requests for Production of Documents upon defendant. On November 22, 2017, plaintiff propounded a Second

1 Set of Requests for Production of Documents upon defendant. Defendant served its responses to the  
2 First Set of Requests for Production of Documents on January 19, 2018 and served its responses to  
3 the Second Set of Requests for Production of Documents on January 26, 2018.

4 Plaintiff conducted the deposition of one of defendant's former employees on March 12,  
5 2018. Plaintiff was unable to serve another one of defendant's former employee with a subpoena  
6 and vacated that deposition. Plaintiff conducted the deposition of a 30(b)(6) representative of  
7 defendant regarding four issues on March 26, 2018. Plaintiff conducted the deposition of one of  
8 defendant's current employees on May 17, 2018. Plaintiff scheduled the deposition of a 30(b)(6)  
9 representative of defendant regarding two additional issues for June 11, 2018. Plaintiff agreed to  
10 reschedule that deposition as Defendant is in the process of substituting counsel.

11 The parties served initial expert witness disclosures on May 4, 2018. Defendant served a  
12 supplemental expert witness disclosure on June 5, 2018.

13 **B. DISCOVERY THAT REMAINS TO BE COMPLETED**

14 Defendant needs to conduct the deposition of plaintiff and up to four of plaintiff's healthcare  
15 providers. Plaintiff has scheduled the deposition of defendant's 30(b)(6) representative regarding  
16 two additional topics. Plaintiff may also conduct the depositions of additional employees and  
17 representatives. The parties also anticipate conducting the depositions of designated expert  
witnesses.

18 **C. REASONS WHY DISCOVERY HAS NOT BEEN COMPLETED**

19 Defendant is in the process of substituting counsel in this matter. That substitution of  
20 counsel has delayed the scheduling and completion of the remaining depositions as new counsel  
21 becomes familiar with this matter and the parties schedule the depositions based upon new counsel's  
22 availability.

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1 Accordingly, the parties request a thirty day extension of the current discovery deadlines.

2 **D. PROPOSED DISCOVERY SCHEDULE**

3 Close of Discovery: August 2, 2018  
4 Dispositive Motions: September 4, 2018  
5 Joint Pre-Trial Order: October 4, 2018  
6 Last day to amend pleadings: Closed  
Initial Expert Disclosures: Closed  
Rebuttal Expert Disclosures: Closed  
Interim Status Report Closed

7 DATED this 12<sup>th</sup> day of June, 2018.

DATED this 12<sup>th</sup> day of June, 2018.

9 **WILSON, ELSE, MOSKOWITZ,  
10 EDELMAN & DICKER LLP**

**THE GALLIHER LAW FIRM**

11 BY: /s/Douglas M. Rowan  
12 Douglas M. Rowan  
13 Nevada Bar No. 004736  
14 300 South Fourth Street, 11th Floor  
Las Vegas, Nevada 89101  
15 Attorneys for defendant Target Corporation

BY: /s/Keith E. Galliher  
Keith E. Galliher, Jr.  
Nevada Bar No. 000220  
1850 East Sahara Avenue, Suite 107  
Las Vegas, Nevada 89104  
19 Attorney for plaintiff Rebecca Martin

16 IT IS SO ORDERED.

**NO FURTHER EXTENSIONS  
17 WILL BE GRANTED.**

18 Dated June 13, 2018

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20 **UNITED STATES MAGISTRATE JUDGE**